

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X	
DAUM GLOBAL HOLDINGS CORP.,	:	ECF CASE
	:	
Judgment Creditor-Petitioner,	:	13 cv 3135 (AJN)
	:	
vs.	:	
	:	<b>NOTICE OF MOTION FOR</b>
YBRANT DIGITAL LIMITED (a/k/a LYCOS	:	<b>ENFORCEMENT OF MONEY</b>
INTERNET LIMITED), YBRANT MEDIA	:	<b>JUDGMENT UNDER N. Y.</b>
ACQUISITION, INC.,	:	<b>CPLR ARTICLE 4 AND RULE</b>
	:	<b>69 (a)</b>
	:	
Judgment Debtors-Respondents, and	:	
	:	
LYCOS, INC.	:	
	:	
Garnishee-Respondent	:	
-----	X	

PLEASE TAKE NOTICE that upon the accompanying affirmation of Bo-Yong Park dated January 21, 2016, the Exhibits thereto, and the accompanying Memorandum of Law, the undersigned counsel for the Petitioner-Judgment Creditor here, Daum Global Holdings Corp., respectfully brings on the within motion/petition for an order appointing Judgment Creditor as receiver of Judgment Debtor Ybrant Media Acquisition Inc.'s 56% ownership interest in Lycos, Inc.

TAKE FURTHER NOTICE THAT RESPONDENTS ARE SERVED BY CERTIFIED MAIL AT THEIR AGREED ADDRESSES AS PER THEIR CONSENT TO BE SUED IN THIS COURT. RESPONDENT LYCOS, INC. IS SERVED UPON ITS NEW YORK AGENT FOR SERVICE OF PROCESS. SERVICE IS ALSO MADE BY CERTIFIED MAIL AND ECF UPON COUNSEL FOR RESPONDENTS HEREIN:

David C. Wrobel, Esq.  
Katharine Sherman, Esq.

Wrobel Markham Schatz Kaye & Fox  
360 Lexington Avenue  
New York, New York 10018

Opposing papers, if any, are due 21 days after service hereof. Petitioner reserves a right of reply within 10 days after service of opposing papers. Petitioner respectfully requests oral argument.

THE LAW OFFICE OF BO-YONG PARK, P.C.

By:   
Bo-Yong Park (BP1622)

Bo-Yong Park (BP1622)  
William J.T. Brown (WB1306), Of Counsel  
632 West 28<sup>TH</sup> Street, 4<sup>th</sup> floor  
New York, New York 10001  
(800) 615-6470

Attorneys for Petitioner-Judgment Creditor  
Daum Global Holdings Corp.

Dated: January 21, 2016